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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**NOTICE OF AGENDA FOR MATTERS SCHEDULED  
FOR HEARING ON MARCH 28, 2018 AT 10:00 A.M.**

**CONTESTED MATTERS**

1. **10-05048; Picard v. Estate of Armand L. Greenhall, et al.**
  - A. Memorandum Of Law In Support Of The Trustee's Motion For Entry Of An Order Pursuant To Rules 15 And 21 Of The Federal Rules Of Civil Procedure, As Incorporated By Rules 7015 And 7021 Of The Federal Rules Of Bankruptcy Procedure, Granting The Trustee Leave To File A Second Amended Complaint And For Related Relief filed by Nicholas Cremona on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff (Filed: 3/9/2018) [ECF No. 71]

- B. Declaration Of Nicholas J. Cremona In Support Of The Trustee's Motion For Leave To File A Second Amended Complaint And For Related Relief filed by Nicholas Cremona on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff (Filed: 3/9/2018) [ECF No. 72]
- C. Notice Of Motion And Motion For Entry Of An Order Pursuant To Rules 15 And 21 Of The Federal Rules Of Civil Procedure, As Incorporated By Rules 7015 And 7021 Of The Federal Rules Of Bankruptcy Procedure, Granting The Trustee Leave To File A Second Amended Complaint And For Related Relief filed by Nicholas Cremona on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff (Filed: 3/9/2018) [ECF No. 73]

Objections Due: March 21, 2018

Objections Filed:

- D. Opposition to Motion for Leave to Amend filed by Barry R. Lax on behalf of Peng Yan, individually and as Personal Representative of the Estate of Armand L. Greenhall (Filed: 3/23/2018) [ECF No. 76]
- E. Affirmation in Support of Opposition to Motion for Leave to Amend filed by Barry R. Lax on behalf of Peng Yan, individually and as Personal Representative of the Estate of Armand L. Greenhall (Filed: 3/23/2018) [ECF No. 77]

Reply Filed:

- F. Reply In Support Of The Trustees Motion For Entry Of An Order Pursuant To Rules 15 And 21 Of The Federal Rules Of Civil Procedure, As Incorporated By Rules 7015 And 7021 Of The Federal Rules Of Bankruptcy Procedure, Granting The Trustee Leave To File A Second Amended Complaint And For Related Relief filed by Nicholas Cremona on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff (Filed: 3/26/2018) [ECF No. 78]
- G. Declaration Of Nicholas J. Cremona In Support Of The Trustee's Motion For Leave To File A Second Amended Complaint And For Related Relief filed by Nicholas Cremona on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff (Filed: 3/26/2018) [ECF No. 79]

Related Documents:

- H. So Ordered Stipulation And Order Between The Trustee And Defendant Peng Yan Signed On 3/21/2018 Re: Extending The Defendant's Time To Respond To The Trustee's Motion For Entry Of An Order Pursuant To Rule 15 And 21 Of The Federal Rules Of Civil Procedure, As Incorporated By Rules 7015 And 7021 Of The Federal Rules Of Bankruptcy Procedures, Granting The Trustee Leave To File A Second Amended Complaint And For Related Relief (Filed: 3/22/2018) [ECF No. 75]

Status: This matter is going forward.

2. **10-05354; Picard v. ABN AMRO Bank, N.V.**

- A. RBS/ABN's Rule 7054(a) Motion to Revise the Memorandum Decision and March 3, 2017 Order to Dismiss Clawback Claims for Subsequent Transfers from Rye Select Broad Market XL Portfolio Limited filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.) (Filed 3/1/2018) [ECF No. 155]
- B. Memorandum of Law in Support of RBS/ABN's Rule 7054(a) Motion to Revise the Memorandum Decision and March 3, 2017 Order to Dismiss Clawback Claims for Subsequent Transfers from Rye Select Broad Market XL Portfolio Limited filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (Filed: 3/1/2018) [ECF No. 156]
- C. Declaration of Michael S. Feldberg in Support of RBS/ABN's Rule 7054(a) Motion to Revise the Memorandum Decision and March 3, 2017 Order to Dismiss Clawback Claims for Subsequent Transfers from Rye Select Broad Market XL Portfolio Limited filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.) (Filed: 3/1/2018) [ECF No. 157]

Objections Due: 3/21/2018

Objections Filed:

- D. Memorandum Of Law In Opposition To The Request For Judicial Notice And Rule 7054(A) Motion To Revise The Memorandum Decision filed by David J. Sheehan on behalf of Irving H. Picard, Esq., Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff (Filed: 3/21/2018) [ECF No. 161]

Reply Filed:

- E. Reply to Motion to Revise the Memorandum Decision and March 3, 2017 Order

to Dismiss Clawback Claim for Subsequent Transfers from Rye Select Broad Market XL Portfolio Limited filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.) (Filed: 3/26/2018) [ECF No. 163]

Status: This matter is going forward.

3. **12-01576; Picard v. BNP Paribas S.A., et al.**

- A. Notice of Motion to Compel filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (Filed: 2/9/2018) [ECF No. 118]
- B. Memorandum of Law in Support of the Trustee's Motion to Compel Defendants to Produce Documents filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (Filed: 2/9/2018) [ECF No. 119]
- C. Declaration of Jonathan A. Forman, Esq. in Support of the Trustee's Motion to Compel Defendants to Produce Documents filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (Filed: 2/9/2018) [ECF No. 120]

Objections Due: March 23, 2018

Objections Filed:

- D. Memorandum of Law in Support of the BNP Paribas Defendants' Motion to Stay Discovery and in Opposition to the Trustee's Motion to Compel filed by Breon Peace on behalf of BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust Cayman Limited, BNP Paribas S.A., BNP Paribas Securities Services S.A. (Filed: 3/19/2018) [ECF No. 127]

Status: This matter is going forward.

4. **12-01576; Picard v. BNP Paribas S.A., et al.**

- A. Notice of Motion to Stay Discovery filed by Breon Peace on behalf of BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust Cayman Limited, BNP Paribas S.A., BNP Paribas Securities Services S.A. (Filed: 3/19/2018) [ECF No. 125]
- B. Declaration of Donna (Dong) Xu, dated March 19, 2018, in Support of the BNPP Defendants' Motion to Stay Discovery filed by Breon Peace on behalf of BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust Cayman Limited, BNP

Paribas S.A., BNP Paribas Securities Services S.A. (Filed: 3/19/2018) [ECF No. 126]

- C. Memorandum of Law in Support of the BNPP Defendants' Motion to Stay Discovery and in Opposition to the Trustee's Motion to Compel filed by Breon Peace on behalf of BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust Cayman Limited, BNP Paribas S.A., BNP Paribas Securities Services S.A. (Filed: 3/19/2018) [ECF No. 127]

Objections Due: March 23, 2018

Objections Filed:

- D. Memorandum of Law in Opposition to Defendants' Cross-Motion to Stay Discovery filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (Filed: 3/23/2018) [ECF No. 131]

Reply Filed:

- E. Reply Memorandum of Law in Further Support of the BNP Paribas Defendants' Motion to Stay Discovery filed by Breon Peace on behalf of BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust Cayman Limited, BNP Paribas S.A., BNP Paribas Securities Services S.A. (Filed: 3/26/2018) [ECF No. 132]

Status: This matter is going forward.

Dated: March 27, 2018  
New York, New York

By: /s/David J. Sheehan  
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